

EXHIBIT 1

LAW OFFICES OF DALE K. GALIPO

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Attorneys for Plaintiffs,

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

GALE SOSTEK; and HERB SOSTEK,

Plaintiffs,

vs.

COUNTY OF SAN BERNARDINO;
SAMUEL FULLER; and DOES 2-10,
inclusive,

Defendants.

Case No. 5:23-cv-2236 MRA

[*Hon. Monica Ramirez Almadani*]

**PLAINTIFFS' RULE 26 INITIAL
EXPERT DISCLOSURE**

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10 Attorneys for Plaintiffs

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

GALE SOSTEK; and HERB SOSTEK

Plaintiffs,

vs.

COUNTY OF SAN BERNARDINO;
and DOES 1-10, inclusive,

Defendants.

Case No.: 5:23-cv-02236-SPG-MRW

**PLAINTIFFS' INITIAL
DISCLOSURES**

Plaintiffs state that based on the information currently known to them, at least the following persons (exclusive of expert witnesses, attorneys, and their support staff) have knowledge of facts that Plaintiffs may use to support their material allegations. The subjects of information specified are those of which Plaintiffs are currently aware or Plaintiffs reasonably believe are in within the knowledge of the identified individuals.

1		<u>Name</u>	<u>Subject Matter(s)</u>
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3	1.	Gale Sostek; c/o Plaintiffs' counsel	Plaintiffs' injuries and damages.
4			
5	2.	Herb Sostek; c/o Plaintiffs' counsel	Plaintiffs' injuries and damages.
6			
7	3.	The Involved County of San Bernardino Deputies (names currently unknown); c/o defense counsel	Use of excessive force against Decedent.
8			
9	4.	The Involved San Bernardino County Fire Department members (names currently unknown)	Decedent's injuries, medical treatment and medical expenses.
10			
11			
12	5.	Medical Examiner (name currently unknown); San Bernardino County Coroner's Office	Decedent's injuries.
13			
14			

15
16 Plaintiffs incorporates by reference all witnesses identified in Defendants'
17 Initial Disclosures.

18 Plaintiffs' investigation of this matter is not yet complete, and Plaintiff has
19 not concluded his discovery in this matter. Plaintiff reserves the right to identify
20 additional individuals with such knowledge as such persons become known to
21 Plaintiff or the information they possess becomes relevant to the claims or defenses
22 of any party, pursuant to Rule 26(e).

23 **B. Documents**

24 Plaintiff has within his possession, custody, and control the following
25 categories of documents that Plaintiffs may use to support their material claims and
26 defenses:

- 27 1. Death Certificate;
- 28 2. Autopsy Report;

- 1 3. Photos of Decedent;
- 2 4. Photos of Plaintiffs;
- 3 5. Funeral and Burial Expenses.

4 Plaintiffs incorporate by reference all documents identified in Defendants'
5 Initial Disclosures.

6 Plaintiffs' investigation of this matter is not yet complete, and Plaintiffs have
7 not concluded their discovery in this matter. Plaintiffs reserve the right to identify
8 additional categories of documents as they become known to Plaintiffs or they
9 become relevant to the claims or defenses of any party, pursuant to Rule 26(e).

10 **C. Computation of Damages**

11 Plaintiffs seek wrongful death damages and survival damages under federal law
12 and state law.

13 Plaintiffs seek economic damages, including loss of financial support, past
14 medical expenses and funeral and burial expenses.

15 Plaintiffs seek punitive damages in an amount to be proven at trial from each
16 of the individual defendants.

17 Plaintiffs seek attorneys' fees pursuant to 42 U.S.C. § 1988.

18 Plaintiffs also seeks interest and other costs associated with the litigation.

19 Plaintiffs' investigation of this matter is not yet complete, and Plaintiffs have
20 not concluded their discovery in this matter. Plaintiffs reserve the right to
21 supplement or amend their computation of damages, pursuant to Rule 26(e).

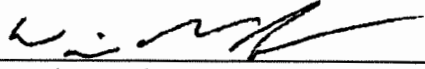
22 Counsel for Plaintiffs certifies that, to the best of their knowledge,
23 information and belief, formed after an inquiry that is reasonable under the
24 circumstances, this disclosure is complete and correct as of the date indicated below.

25 However, counsel reserves the right to supplement or amend this disclosure as
26 additional information becomes available, through discovery or otherwise.

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DATED: 1/3/24

LAW OFFICES OF DALE K. GALIPO

By 
Eric Valenzuela
Attorneys for Plaintiffs

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California and am over the
4 age of eighteen years and not a party to the within action. My business address is 21800
Burbank Boulevard, Suite 310, Woodland Hills, California 91367.

5 On January 3, 2024, I served the foregoing document described as: PLAINTIFF'S
6 INITIAL DISCLOSURES on all interested parties, through their respective attorneys of
7 record in this action by placing a true copy thereof enclosed in a sealed envelope addressed
as indicated on the attached service list.

8 METHOD OF SERVICE

9 ☒ (BY MAIL) I enclosed the documents in a sealed envelope or package and
addressed to the parties at the addresses as indicated on the attached service list.

10 ☐ I deposited the sealed envelope or package with the United States
11 Postal Service, with the postage fully prepaid thereon.

12 ☒ I placed the envelope or package for collection and mailing, following
13 our ordinary business practices. I am readily familiar with the
14 practice of this office for the collection, processing and mailing of
documents. On the same day that documents are placed for collection
15 and mailing, it is deposited in the ordinary course of business with the
United States Postal Service, in a sealed envelope with postage fully
prepaid.

16 ☐ (BY ELECTRONIC SERVICE) I caused the foregoing document(s) to be sent via
17 electronic transmittal to the notification addresses listed below as registered with
this court's case management/electronic court filing system.

18 ☐ (BY FEDERAL EXPRESS) I enclosed the documents in an envelope or
19 package provided by an overnight delivery carrier and addressed to the persons at
the addresses as indicated on the attached service list. I placed the envelope or
20 package for collection and overnight delivery at an office or regularly utilized drop
box of the overnight delivery carrier.

21 I declare that I am employed in the office of a member of the bar of this Court at
22 whose direction the service was made.

23 Executed on January 3, 2024, at Woodland Hills, California.

24 K. Slyapich

25 Karen Slyapich
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SERVICE LIST

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